

Broadband *and* Competition – The Right Choice for ATG

✈ The Commission *can and should* accomplish what it set out to do in the NPRM

- “We are concerned that there is only one licensee remaining in this service...”
- “...to meet the needs of consumers traveling on commercial aircraft...”
- “...whether a change to our rules could provide greater opportunities for the **competitive** provision of air-ground service leading to lower prices to consumers and increased choices...”

✈ The goal *is* correct: competition is essential for airlines and passengers

- Competition *for, among and within* airlines
- Leverage, choice and change benefit consumers/passengers

- ✈ **Satellites can't compete in domestic market**
 - Too heavy and expensive for airlines; too costly for end users
- ✈ **AirCell and Boeing have developed a two-license plan that works**
 - Full broadband
 - Full deck-to-deck coverage in the air and on the ground
- ✈ **Staff-favored Auction Proposals *will* lead to Monopoly**
 - Offering the *option* of a single license will become a self-fulfilling prophecy
 - Verizon Airfone with its significant head start and ATG/terrestrial incumbency *will* emerge as the monopolist
- ✈ **The Opportunity for Broadband *and* Competition is on the table**
 - Asked for by airline and wireless industries
 - *Why* would FCC choose now to create a monopoly?
- ✈ **AirCell/Boeing two license plan reduces out-of-band emission concerns and makes possible the migration of existing AirCell customers from the cellular band**

Risks of auctioning a “no-rules” single 4 MHz ATG license

- **License winner could use part of the spectrum for terrestrial use and part for ATG use**
 - Cross Polarization and partial spectral overlap techniques make it possible to carve out, in effect, two licenses from 4 MHz of spectrum – one for terrestrial use and the other one for ATG use
- **Verizon appears to be making a spectrum grab to the detriment of true ATG competition and the objectives of the FCC’s NPRM**